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From: Commanding Officer, Engineering Field Activity, West, Naval Facilities Engineering
Command
To: Distribution
Subj: MONTHLY PROGRESS REPORT FOR JULY 1996 ENGINEERING FIELD
ACTIVITY, WEST, NAVAL FACILITIES ENGINEERING COMMAND, HUNTERS
POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA
Encl: (1) July 1996 Monthly Progress Report (MPR)

1. Enclosure (1) is forwarded for your information.
2. If you have any questions, please contact the undersigned at (415) 244-2571.

Original signed by:

RICHARD E. POWELL
By direction of
the Commanding Officer

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**INSTALLATION RESTORATION PROGRAM
MONTHLY PROGRESS REPORT**

JULY 1996

**NAVAL FACILITIES ENGINEERING COMMAND
HUNTERS POINT SHIPYARD**

1. PROGRESS DURING THE REPORT PERIOD

The activities described below were completed during the current report period. Those activities described as complete in the previous monthly progress report have been omitted for brevity. The facility status is as follows:

- **Field Work:** Remedial investigation fieldwork has been completed for Parcels B and C, including the final surveying of borings and monitoring wells in Parcel C which were completed in July. Most of the remedial investigation fieldwork has been completed for Parcels D and E. A third round of sampling was conducted in July at those monitoring wells in Parcels D and E that had only two previous rounds of groundwater samples. First round sampling and surveying were completed at two of the four off-facility monitoring wells adjacent to the western Parcel E boundary. Groundwater level measurements, sampling and surveying of the other two wells is pending development of an access agreement. A geophysical survey of the vault area in SA-146 (IR-72) in Parcel E was completed in July 1996.

The draft final field sampling plan for the proposed activities at the three formerly used defense sites (FUDS) in Parcel E was completed and submitted to the agencies for review during the month of May. The only comments received on the draft final plan were from the Agency for Toxic Substances and Disease Control (ATSDR). A response to ATSDR comments will be submitted in August 1996. Implementation of the work plan continued during this reporting period. Groundwater well installation and all required surveying was completed at these sites in early July. The third round of groundwater sampling from these new FUDS wells is not expected to be conducted until October or November 1996. All soil borings that are anticipated for the FUDS have been completed. The proposed boring locations at SI-74 and SI-75 have been moved because access to these sites was denied by the property owner. The density of the utility lines in the vicinity of SI-74 have led to the replacement of the borings proposed at this site with a soil gas survey. Sampling is expected to be completed in August.

Indoor air sampling in Parcels B, C, and D has been completed. Limited outdoor air sampling to address remaining data gaps in Parcel E will be performed in September 1996.

- **Parcel A:** The preparation of environmental documentation for transferring Parcel A from the Navy to the City of San Francisco continues on schedule. The next step in the transfer process consists of the preparation of the Environmental Baseline Survey (EBS) and Finding of Suitability to Transfer (FOST) documentation, along with the preparation of the Environmental Impact Statement/Report (EIS/EIR). A scoping meeting in March for the

preparation of the Parcel A EBS/FOST documentation determined that a Parcel A-Specific EBS was not necessary. The Draft Parcel A FOST was submitted to the agencies for review on June 24. Comments were received on July 24 and 25, 1996, from U.S. EPA, DTSC, and the City and County of San Francisco. Responses will be submitted in the Draft Final Parcel A FOST, currently scheduled for submittal in September 1996.

In an additional Parcel A activity, the Navy prepared a Notice of Well Abandonment for Parcel A and obtained concurrence to proceed from EPA, DTSC, RWQCB, and the City of San Francisco. During the month of April, the Navy implemented the abandonment of six monitoring wells in Parcel A. A formal letter documenting the details of the well abandonment will be issued for the administrative record in August

- **RI Reports:** Comments on the Draft Final Parcel B Remedial Investigation (RI) Report were received from the regulatory agencies on July 3, 1996. The Final Parcel B RI Report revision is scheduled for submittal on August 16, 1996. The Draft Parcel D RI Report was submitted on June 28, 1996; agency comments are due in August. Progress is ongoing in the preparation of the Parcel C and E RI reports.

- **FS Reports:** Comments on the Draft Parcel B Feasibility Study (FS) Report were received from the regulatory agencies on July 3, 1996. The Draft Final Parcel B FS Report is scheduled for submittal on September 3, 1996. This submittal date incorporates a 30-day extension invoked by the Navy to allow time for resolution of groundwater alternative issues. The draft Proposed Plan submittal date was also approved for a 30 day extension. Progress is ongoing in the preparation of the Parcel C and D FS reports.

- **Removal Actions:**

Pickling and Plate Yard (IR-9): This removal action was completed by the Navy Public Works Center San Francisco Bay (Public Works). The Navy has started the preparation of the Draft Construction Summary Report and expects to submit the report in August.

Exploratory Excavations: Comments from the regulatory agencies on the Draft Exploratory Excavation Action Memorandum were received on July 19, 1996. The Final Exploratory Excavation Action Memorandum was submitted for review and signature on July 24, 1996 and was signed on July 25, 1996.

IR-1/21 Industrial Landfill Groundwater Plume: The Navy submitted the Final IR-1/21 Groundwater EE/CA on July 26, 1996. The Draft IR-1/21 Action Memorandum was submitted on July 19, 1996. The Navy expects to start work on this removal in the late summer to early fall of 1996.

IR-3 Waste Oil Ponds: The Draft Final IR-3 EE/CA was submitted for review on July 12, 1996. The revised EE/CA incorporates a new objective to contain and control contamination from IR-3 rather than remove contaminant sources. The new recommended alternative in the report involves the installation of a sheet pile wall. The Draft IR-3 Action Memorandum was submitted to the regulatory agencies on July 19, 1996. The Navy continued work on the IWP and OPCC due on August 30, 1996.

The Navy and PRC and Levine-Fricke gave a brief presentation at the July 24 RAB meeting summarizing the IR-3 removal action. A public notice for the IR-3 removal action was published in the July 16 issue of *The Independent* announcing the 30-day public comment period for the Draft Final EE/CA for IR-3. The public comment period will end on August 15, 1996.

Storm Drains: The Final Storm Drain EE/CA was submitted for agency review on July 26, 1996. The Draft Storm Drain Action Memorandum was submitted on July 19. The revised reports incorporate the reduced scope of the removal which includes only sediment removal, as discussed at the BCT meeting held on July 18, 1996. After the sediment removal, storm water monitoring will be performed to determine if any contaminated groundwater is infiltrating into the storm drain system. If groundwater is found to be infiltrating, repair of those conditions will be addressed in the final remedial action.

Tank Farm (IR-6): This work is being performed by Public Works. The Navy submitted the Draft Final Tank Farm EE/CA on May 15, 1996. The public comment period for this removal action began on June 26, 1996. The revisions for the draft final EE/CA is scheduled for 15 August, 1996 and the Draft Action Memorandum is scheduled for August 22, 1996.

Dry Dock 4: The preparation of documentation is being performed by Supervisor of Shipbuilding, Conversion and Repair, Portsmouth, Virginia, Environmental Detachment, Vallejo (SSPORTS). Additional sampling was conducted in February to perform the modified waste extraction test (WET) for bay water exposure. Preliminary results indicate low to non-detected concentrations of most metals. The Navy expects to submit the revised Draft Dry Dock 4 EE/CA on August 8, 1996.

- **Ecological Risk Assessment Phase 1B:** The screening of the analytical data collected against sediment and water quality criteria was initiated in July 1996, and sediment distribution maps are being prepared. Analytical, bioassay, and tissue data has been validated and the qualifiers have been added to the chemical data base; an electronic copy of the data was forwarded to several regulatory groups upon request. The Draft Phase 1B Ecological Risk Assessment Report is scheduled for submittal on September 30, 1996, in accordance with the approved submittal extension request.

The Draft Preliminary Assessment for Parcel F was awaiting comments from the regulatory agencies; however, the Navy was informed at the BCT meeting held on July 18, 1996, that no comments were forthcoming. As a result, the draft was finalized in July 1996.

- **Radiation Issues:** Submittal of the Draft Final Phase III Radiation Investigation Field Work Plan was delayed following regulatory agency requests for complete historical documentation to be included. The Navy Radiological Affairs Support Office (RASO) and the regulatory agencies met on July 11 to discuss the documentation process. As a result of the meeting, the responses will be prepared following input from the regulatory agencies and are expected to be submitted in August 1996. The Navy submitted to the agencies a technical memorandum that addresses the tidal area surrounding IR-2 on June 13, 1996; comments have not been received.

The Navy prepared an abbreviated feasibility study to evaluate the remedial alternatives, costs, public perception, and other factors associated with the removal of radium dials in the landfill. Verbal comments were received from the regulator agencies on June 17; however, the BCT will decide on what follow up is required following receipt of written comments.

Eighty-two drums of IDW from IR-07 and IR-18 were removed off-site for disposal. Other radiation-related field activities conducted during July included weekly inspections and maintenance of drums and bins containing potentially radioactive IDW.

- **Community Relations:** The Draft Final Revised Community Relations Plan (CRP) was submitted to the regulatory agencies on June 11, 1996; comments were received from DTSC on July 3, 1996 and the proposed response is under evaluation. The Navy conducted an open house at HPS on July 25, 1996.
- **PCB Occurrences:** The Navy submitted an evaluation of PCB occurrences to the regulatory agencies on June 26, 1996. The evaluation included a discussion of locations with PCB concentrations that exceed 1 mg/kg to the adequacy of site characterization. Based on the evaluation, it appears that characterization of the occurrences of PCBs has been completed and will be presented under the ongoing RI reports.

2. REPORTS SUBMITTED AND MEETINGS

Meetings

- The BCT/remedial project manager (RPM) meetings were conducted on July 2, 10, and 18, 1996.
- A RAB meeting was held on July 24, 1996. During this meeting, the Navy provided a presentation explaining the removal action at IR-3, Waste Oil Ponds, and the Draft Parcel D RI report.

Submittals

- Draft Storm Drain Action Memorandum
- Final Storm Drain EE/CA
- Draft IR-1/21 Action Memorandum
- Final IR-1/21 EE/CA
- Draft Final IR-3 EE/CA
- Draft IR-3 Action Memorandum

- Final Parcel F Preliminary Assessment
- Preliminary HGALs Technical Memorandum

3. PROBLEMS ENCOUNTERED AND RESOLUTIONS

- **Offsite Access for RI Work:** The Navy completed four groundwater monitoring wells off-facility, adjacent to the western boundary of IR-01 in Parcel E. Two of the wells were installed on City of San Francisco property as planned. The other two wells were inadvertently located on State property. The California Department of Parks and Recreation, the apparent trustee of the land, is expected to resolve this issue with the Navy to permit Navy access to these wells by the end of August.
- **Parcel A FOST:** The Navy will perform a property boundary survey of Parcel A to provide a legal description for the FOST.
- **Agency Requests for Full Radiation Documentation:** The delivery of the Draft Final Phase III Radiation Investigation Field Work Plan has been delayed due to the agency requests for complete historical documentation. A meeting between the RASO and the regulatory agencies was conducted on July 11, 1996 to resolve the documentation process. The result of this meeting was that the provided documentation was considered adequate and clarification will be provided in the revised responses.
- **Petroleum-only Sites at HPS:** The Navy has started the identification of installation restoration sites that contain (1) petroleum-only constituents (non-CERCLA hazardous substances) in soils; (2) petroleum constituents with CERCLA substances in soils below screening levels; (3) CERCLA substances in soils above screening levels; and (4) sites that require no further action. The purpose is to segregate petroleum-only issues from CERCLA issues for administrative purposes, and inclusion of these sites in a petroleum corrective action plan.
- **Scope of the Basewide RI Report:** The current FFA lists a deliverable for a Basewide RI Report to accompany the delivery of the Parcel E RI Report. The scope of the Basewide RI is not currently defined. Current discussions concerning the Basewide RI are focusing on a Basewide ROD to address ecological issues. The preparation of the draft Parcel E RI Report before the final reports from the ecological risk assessment may result in a data gap which could obligate the Navy to prepare a Basewide RI/FS/ROD. The scope of a Basewide RI report and potential Basewide ROD are under discussion between the Navy and the BCT and will be included as a topic in upcoming BCT meetings. The Navy submitted a proposed scope of work for the Basewide RI to the agencies on June 14, 1996. The Navy and BCT are still evaluating the need and or scope for a Basewide ROD.
- **Hunters Point Shipyard Groundwater Ambient Levels (HGAL):** The Navy has developed HGALs, on a basewide basis, for naturally occurring metals that have a maximum contaminant level (MCL), U.S. EPA Region 9 tap water preliminary remediation goal (PRG), or National Ambient Water Quality Criteria (NAWQC). The purpose of

establishing HGALs is to have an ambient value for each naturally occurring metal in the HPS A-Aquifer groundwater to compare against detected metals in A-Aquifer groundwater monitoring wells. The Navy completed the preliminary statistical analysis for submittal to the regulatory agencies on June 21, 1996. Following receipt of comments, the Navy issued draft HGALs to the regulatory agencies on July 1, 1996. The Navy will document the calculations of the HGALs in a technical memorandum scheduled for submittal in August 1996.

4. REPORTS AND ACTIVITIES FOR AUGUST 1996

Documents Scheduled for August 1996 Submittal

- Draft Pickling and Plate Yard Construction Summary Report
- Draft Final Study of Groundwater Sampling Methods for Metals Technical Memorandum (If required)
- Revised Draft Final IR-6 EE/CA
- Draft IR-6 Removal Action Memorandum
- Technical Memorandum - HGAL Calculations.
- Draft Dry Dock 4 EE/CA

Activities Planned for August 1996

- **Field Investigations:** Continue with the implementation of groundwater sampling at Parcels D and E. Conduct soil gas survey at SI-74. Conduct limited outdoor air sampling to address remaining data gaps in Parcel E.
- **Removal actions:** Continue work at Dry Dock 4 and IR-6. The removals at the exploratory excavation sites is due to begin on August 8, 1996. Continue with the preparation of the documentation for upcoming removal actions.
- **Survey of Parcel A Boundary:** Parcel A Boundary is to be surveyed to provide a legal description for the FOST.
- **Meetings:** Attend the BCT/RPM meeting scheduled for August 20, 1996. Attend the RAB meeting scheduled for August 28, 1996.
- **Radiation Issues:** Prepare for the screening of NRDL sites to be conducted in September 1996. Continue the radiation-related waste management activities. Continue the preparation of the Draft Final Phase III Radiation Investigation Field Work Plan.

- **RI/FS Reports:** Continue the preparation of the Parcels C, D and E RI reports. Prepare for a meeting regarding the regulatory agency comments on the Draft Parcel D RI and FS reports.
- **BCT Activities:** Prepare for the monthly BCT/RPM meeting.

5. KEY PERSONNEL CHANGES

Navy: A replacement for David Song, who left the project on June 21, has been designated. The new RPM, Glenna Clark, is tentatively responsible for Parcel C, Dry Dock 4, and petroleum corrective action plans. As previously stated, RPM Luann Tetirick will manage the IR-3 removal action, Parcel E, and radiation issues, with the addition of the IR-1/21 removal action. The final delegation of the responsibilities of the RPMs is still to be determined.

6. DELIVERABLES STATUS

This listing consists of installation deliverables organized by parcel, multiparcel (or facility wide), and removal actions, and their status. Please note that as deliverables are completed, they will no longer be included in subsequent progress reports.

Parcel A Reports

- Draft Final Parcel A Finding of Suitability to Transfer
Status: Scheduled submittal to the agencies in September 1996, due to the delay in completing the legal survey of Parcel A.

Parcel B Reports

- Final Parcel B Remedial Investigation Report
Status: Response to agency comments on the report is scheduled for submittal on August 16, 1996.
- Draft Final Parcel B Feasibility Study Report
Status: Scheduled submittal to the agencies on September 3, 1996. Agency review period is 30 days.

Parcel C Reports

- Draft Parcel C RI Report
Status: Scheduled submittal to agencies on November 30, 1996. Agency review period is 45 days. Currently undergoing data base quality control, data interpretation, and report preparation.
- Draft Parcel C Feasibility Study Report
Status: Scheduled submittal to the agencies on February 27, 1997. Agency review period is 45 days.

Parcel D Reports

- Draft Final Parcel D RI Report
Status: Submitted to agencies on June 28, 1996. Agency review period is 30 days.
- Draft Parcel D Feasibility Study Report
Status: Scheduled submittal to the agencies on September 26, 1996. Agency review period is 45 days.

Parcel E Reports

- Draft Radiation Investigation of the Tidal Area Surrounding the Bay Area Landfill (IR-02) Technical Memorandum
Status: The report was submitted to the agencies on June 20, 1996; the Navy is currently awaiting agency comments.
- Draft Parcel E RI Report
Status: Scheduled submittal to agencies on April 29, 1997. Agency review period is 45 days. Currently performing quality control of the Parcel E database.

Parcel F Reports

- Draft Phase 1B Ecological Risk Assessment Report
Status: Scheduled submittal to agencies on September 30, 1996. Currently undergoing data interpretation.

Multiparcel/Facility-Wide Investigation Reports

- Draft Final Results of Subsurface Radiation Investigation on Parcels B and E
Status: The report was submitted to the agencies in mid July.
- Draft Final Phase III Radiation Investigation Field Work Plan
Status: Submittal due to the Navy was April 26, 1996; however, due to agency requests for complete historical documentation, the delivery has been delayed pending guidance from RASO and a discussion with the regulatory agencies on July 11, 1996.
- Draft Annual OU II Groundwater Monitoring Report
Status: Submitted to the agencies in June, 1996.
- Draft Final Revised Community Relations Plan
Status: Delivered to the agencies on June 11, 1996.
- Final Basewide Environmental Baseline Survey
Status: Submitted to the agencies on June 3, 1996.

- Draft Study of Groundwater Sampling Methods for Metals Technical Memorandum
Status: Distributed to the agencies in May and currently awaiting comments.
- Draft Review of PCB Occurrences in Soil and Groundwater Technical Memorandum
Status: Submitted to the agencies on June 26, 1996.

Removal Actions

- Final IR-1/21 Groundwater Removal EE/CA
Status: Submitted to the agencies on July 26, 1996, with the Draft IR-1/21 Action Memorandum.
- Draft Final IR-3 Floating Product Removal EE/CA
Status: Submitted to the agencies on July 19, 1996, with the Draft IR-3 Action Memorandum.
- Final Storm Drain Sediment Removal EE/CA
Status: Submitted to the agencies on July 26, 1996, with the Draft Storm Drain Action Memorandum.
- Draft Construction Summary Report of Pickling and Plate Yard Removal Action
Status: Due 90 days after completion of the removal action. The draft report will be submitted in early August 1996.

Richard Powell for
RICHARD POWELL
LEAD REMEDIAL PROJECT MANAGER

8/22/96
DATE